UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 28 2016

CERTIFIED MAIL 7015 1730 0002 0524 4034
RETURN RECEIPT REQUESTED

ZF Gainesville, LLC
ATTN: Mr. Phillip Linderenstruth
Director of Operations
1261 Palmour Drive SW
Gainesville, Georgia 30501

Re: Information Request Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, for ZF Gainesville, LLC, in Gainesville, Hall County, Georgia.

Dear Mr. Linderenstruth:

On September 1, 2015, the U.S. Environmental Protection Agency Region 4 performed an inspection of ZF Gainesville, LLC's facility (Facility) located at 1261 Palmour Drive SW in Gainesville, Hall County, Georgia. The purpose of the inspection was to evaluate ZF Gainesville, LLC's compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); and the regulations promulgated thereunder at 40 C.F.R. Part 403 and Part 433; and the State of Georgia pretreatment regulations at Ga. Comp. R. & Regs. 391-3-6-.08 and 391-3-6-.09.

The EPA is providing the enclosed Inspection Report describing specific observations made at the Facility during the inspection (See Enclosure A). The EPA is continuing to investigate the Facility's compliance with the CWA. Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that ZF Gainesville, LLC provide the information set forth in Enclosure B within twenty-one (21) calendar days of your receipt of this letter.

ZF Gainesville, LLC's response should be submitted to:

Ms. Jeannie Williamson
U.S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
Atlanta Federal Center (MC 9T25)
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Failure to provide a full and complete response to this information request or to adequately justify a failure to respond within the time frame specified above may result in an EPA enforcement action pursuant to federal law, including, but not limited to Section 309 of the CWA, 33 U.S.C. § 1319, and 18 U.S.C. § 1001.

If ZF Gainesville, LLC believes that any of the requested information constitutes confidential business information, it may assert a confidentiality claim with respect to such information, except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure C.

All information submitted in response to this information request must be accompanied by the following certification that is signed by a duly authorized official in accordance with 40 C.F.R. § 403.12(l):

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Please be aware that the EPA may use information in response to this information request in any enforcement proceeding related to this matter.

Enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet to assist* ZF Gainesville, LLC in understanding the compliance assistance resources and tools available to it. Any decision to seek compliance assistance at this time, however, does not relieve ZF Gainesville, LLC of its obligation to the EPA nor does it create any new rights or defenses and will not affect the EPA's decision to pursue enforcement action.

In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist ZF Gainesville, LLC, the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings*.

The EPA appreciates your prompt attention to this matter. Should you have any questions regarding this letter, please contact Jeannie Williamson at (404) 562-9402. Legal inquiries should be directed to Mr. Matthew Hicks, Associate Regional Counsel, at (404)-562-9670.

Sincerely,

Daniel L. O'Dowd for

Denisse D. Diaz, Chief
NPDES Permitting and Enforcement Branch
Water Protection Division

Enclosure

cc: Mr. Bert Langley
Georgia Environmental Protection Division

Enclosure A

Final Report

ZF Gainesville, LLC

Industrial User Pretreatment Reconnaissance Inspection

September 1, 2015

Prepared for:

EPA Region 4

61 Forsyth Street, S.W.

Atlanta, GA 30303-8960

Prepared by:

PG Environmental, LLC

607 10th Street; Suite 307

Golden, CO 80401-5817

Table of Contents

I. Introduction

On September 1, 2015, PG Environmental, LLC (hereinafter, PG) conducted a pretreatment reconnaissance inspection of the ZF Gainesville, LLC facility (hereinafter, facility) on behalf of U.S. Environmental Protection Agency (EPA) Region 4. The facility location and its mailing address are the same: 1261 Palmour Drive SW; Gainesville, GA 30501. The facility does not have an industrial user discharge permit from either the State of Georgia Environmental Protection Division (State of Georgia) or the City of Gainesville (City); however, publicly available information about the facility suggested a potential need for coverage under a control mechanism. The State of Georgia was notified in advance of the pretreatment reconnaissance inspection activity pursuant to its memorandum of agreement with the EPA.

The facility is located in a large warehouse style building along Palmour Drive SW, south of the Lee Gilmer Memorial Airport. The facility is located at latitude and longitude 34.264684 and -83.832101, respectively.

II. Entry

On behalf of EPA Region 4, PG Inspector, Mr. Danny O'Connell arrived at the facility at 8:50 A.M. and informed a facility employee of the reason for his visit and the purpose of the inspection. He asked whom the appropriate person would be to meet with to discuss facility operations and wastewater generating processes. The facility employee contacted the Human Resources Representative, Ms. Melissa Pethel.

Ms. Pethel provided the contact information for Mr. Heath Talley, the facility's Environmental Health, and Safety (EHS) Supervisor (678-989-5679), and stated that he was at a different facility at that time. Mr. O'Connell contacted Mr. Talley, via phone, to explain the purpose of the inspection. Mr. Talley explained that he was at another ZF facility and would meet Mr. O'Connell at the ZF Gainesville, LLC facility.

While Mr. O'Connell waited for Mr. Talley to arrive at the facility, Mr. Philip Linderenstruth, Director of Operations, asked Mr. O'Connell if he needed anything while he waited for Mr. Talley. Mr. O'Connell asked if he could take photographs during the facility inspection. Mr. Lindersenstruth stated that photographs could be taken at the facility. Mr. Talley arrived at the facility at approximately 9:50 A.M. to participate in the facility inspection.

III. Opening Conference

Mr. Talley and Mr. O'Connell proceeded to the general waiting room in the administrative area of the facility. Mr. O'Connell presented his inspection credentials and provided a full explanation of the purpose and intent of the reconnaissance compliance inspection. Mr. O'Connell requested that Mr. Talley provide a description of the facility's onsite operations and wastewater generating processes.

Mr. Talley explained that the operations began at the facility in 1987. Mr. Talley further explained that the facility is owned by ZF Germany and that there are two additional ZF

locations within the Gainesville area. Specifically, Mr. Talley referred to the facility as "GNS 1" and mentioned that the company owns the "GNS 2" and "GNS 3" facilities also located within Gainesville. Mr. Talley explained that the GNS 2 facility manufactures gearboxes for wind turbines and that the GNS 3 facility manufactures drive trains for heavy equipment and trucks.

Mr. Talley continued to explain the GNS 1 facility's operations and process flow from raw materials to finished product. The facility machines, assembles, and powder coats various drive components, chassis models, transmissions, axels, and specific truck components for the passenger car and commercial vehicle industries.

Mr. Talley explained that the facility was currently adding a new production line; however, he did not anticipate that the new production line would significantly modify the facility's water usage rate or increase production rates. Specifically, the facility was removing and replacing its powder coating booths that are supplied by natural gas. These had required the facility to obtain an air permit and were causing issues for the facility.

During discussions of the facility's operations, Mr. Talley stated that the facility is connected to the City's sanitary sewer system, but that the facility does not have an industrial wastewater discharge permit. Mr. Talley later recalled that the facility does maintain a "general sewer use" permit with the City. However, a permit was not produced at the time of the inspection. He explained the City collected a sample from the facility's manhole in 2010 to characterize the wastewater discharged from the facility and to identify if a surcharge rate should be applied to the discharges (refer to Attachment 2.A). Mr. Talley also mentioned that the facility has an Air Permit and a Storm Water Permit, both issued by the State of Georgia.

Mr. Talley stated that the facility's warehouse occupies approximately 73,000 square feet of the property and that the facility employs approximately 220 individuals. The facility's process line is divided into two major processes: the truck components production process and the passenger vehicle axels/drive components production process.

Mr. Talley explained that the facility uses an iron phosphate wash process to etch the metal surfaces of the products prior to the powder coating application. Mr. Talley stated that wastewater generated from the iron phosphate wash process is evaporated onsite and is not discharged to the City's publicly owned treatment works (POTW). The volume of waste hauled offsite is tracked and trended internally. For details regarding the tracking mechanism used for waste hauling, refer to Section V, Records Review.

IV. Tour of Operations

Mr. O'Connell accompanied Mr. Talley on the inspection of the facility's process area, which is located in a single warehouse on the property. Raw materials consist of different types and sizes of forged and cast steel. The facility also uses hydraulic and lubricating fluids, powder coatings, and metal cleaning solutions in its processes.

Mr. Talley explained that the facility receives drive component orders from various automobile manufacturers, both domestic and foreign. Mr. Talley explained that for the passenger vehicle

axel/drive process line, the parts are degreased and serviced and no wastewater is generated from this process.

Mr. Talley also explained that Mr. Ron Scruggs, the Maintenance Facility Technician, is familiar with the facility's powder coating booths and wastewater generating operations. Mr. Scruggs joined Mr. Talley and Mr. O'Connell for some components of the process area inspection.

Machining Process

Metal castings are machined into parts and assembled into various drive components. Mr. Talley explained that the facility uses approximately 20 computerized numerical control (CNC) machines for the production of drive component parts. Multiple sumps are located throughout the facility's process area in which spent cutting fluids used in the CNC machines are stored. Periodically, the sumps are pumped out using a sump sucker (refer to Attachment 1, Photograph 1). The coolant from the sumps is stored in a 1,000-gallon storage tank and hauled offsite for disposal.

After the machining process, the parts are welded and assembled. Certain drive components are then washed in an iron phosphate wash process, powder coated with either black or yellow powder, packaged, and shipped to various customers.

Iron Phosphate Wash Solution and Disposal Practices

Mr. Talley explained that prior to powder coating, the metal drive components are washed with an iron phosphate solution. The metal drive component parts are attached to an overhead conveyor and are sent though a multi-stage tunnel washer (refer to Attachment 1, Photographs 2 through 4). As the metal drive components progress through the tunnel washer, various chemical solutions are spray-applied to the metal. The chemical solutions include an alkaline solution for initial cleaning, an iron phosphate solution for etching the surface of the metal, and the application of a sealant and a series of rinse baths.

Mr. Talley stated that none of the solutions from the iron phosphate wash process, nor the rinse water is discharged to the City's POTW. He explained that solutions for the iron phosphate wash process are replenished on a weekly basis, and that spent solutions are hauled offsite semi-annually by a hauling company. Rinse water from the iron phosphate wash process is evaporated onsite on a weekly basis.

Rinse water from the iron phosphate process is collected in a wastewater collection sump located near the powder coating process area. The rinse water is then pumped to a 2,000-gallon holding tank located in the facility's outdoor storage tank containment area (refer to Attachment 1, Photograph 5). Wastewater from the outdoor holding tank is pumped to a 600-gallon indoor holding tank located near the facility's wastewater evaporator unit. Wastewater from the indoor holding tank is pumped into the evaporator unit and evaporated at a rate of approximately 33 gallons per hour. The evaporator unit contains a release valve that allows the facility to drain the content of the evaporator back to the outside holding tank. Mr. Talley explained that the evaporator at the facility is operated 24 hours per day, seven days per week.

The outdoor storage tank area was observed behind the building. Mr. Talley explained that the 2,000-gallon holding tank is used to store rinse water from the iron phosphating process and that the 1,000-gallon storage tank is used to store oily wastes. The 1,000-gallon oily waste tank is pumped out and hauled offsite for disposal. Both tanks are located within a concrete secondary containment structure that contained a locked drain structure (refer to Attachment 1, Photograph 6). Mr. Talley stated that uncontaminated storm water that accumulates within the containment structure is drained out periodically and is allowed to drain and evaporate on the concrete area surrounding the containment structure.

A parts washing unit was observed in a separate area of the facility (refer to Attachment 1, Photograph 7). Mr. Talley stated that the wastewater generated from the parts washer is plumbed to the 2,000-gallon wastewater holding tank and is subsequently evaporated.

Powder Coating Process

A portion of the washed parts are then powder coated, per customer requests. From the powder coat booth, parts are dried in the facility's oven prior to packaging and shipping. A five-gallon bucket of methyl ethyl ketone (MEK) solvent is stored in the power coat booth area and may be used for cleaning and paint thinning.

V. Records Review

Mr. O'Connell reviewed the following documents during or shortly following the inspection:

- December 2010 Wastewater Profile Sampling Results, City of Gainesville Public Utilities Department.*
- Manganese Phosphate Tank Line Overview and Standard Work Sheets – Revised October 17, 2013.
- Future Truck Component (TC) Area Layout Map – CONFIDENTIAL.
- Environmental Remedies, LLC Wastewater Hauling Manifest, dated October 9, 2014.*
- 2015 Plant Sanitary Sewage Graph.*
- 2015 Waste Graph.*
- 2015 Plant Sanitary Sewage Costing Spreadsheet.
- Environmental Remedies, LLC and ZF Industries Sales History Documents, January 1, 2015 through July 31, 2015.*

*These documents are provided in Attachment 2 of this report.

VI. Closing Conference

After the inspection of the process and operation areas, Mr. Talley and Mr. O'Connell met in a conference room. Mr. O'Connell explained that, based on the information provided and observed during the inspection, it did not appear that the facility was subject to federal categorical pretreatment standards since wastewater was not discharged to the City's POTW from the categorical processes regulated by 40 C.F.R 433, Metal Finishing. Mr. O'Connell exited the facility at approximately 12:45 P.M.

VII. Findings

A. The pretreatment standards and requirements identified in 40 C.F.R Part 403 apply to non-domestic discharges to the public sewer. The facility conducts an iron phosphate rinse of the metal drive component parts prior to the powder coating process. This rinse process is considered a categorical operation regulated by 40 C.F.R Part 433, Metal Finishing, however the associated wastewater is evaporated at the facility and not discharged to a POTW. The facility only discharges domestic waste to the City's POTW.

B. The facility and grounds were acceptably maintained and the facility practices good housekeeping of its raw materials. However, the outdoor storage tank secondary containment structure contained accumulated storm water (refer to Attachment 1, Photograph 8). High water marks were observed on each tank indicating the level of storm water accumulation experienced in the containment structure. Due to the presence of the high water marks on the tanks, it appeared that the secondary containment structure frequently experienced storm water accumulation.

C. Floor drains were not observed within the process areas inspected during the site visit.

VIII. Recommendations

The facility needs to take measures to ensure that storm water accumulating into the outdoor storage tank secondary containment structure is routinely drained and appropriately handled to prevent the reduction of containment structure storage capacity and storm water contamination.

IX. Attachments

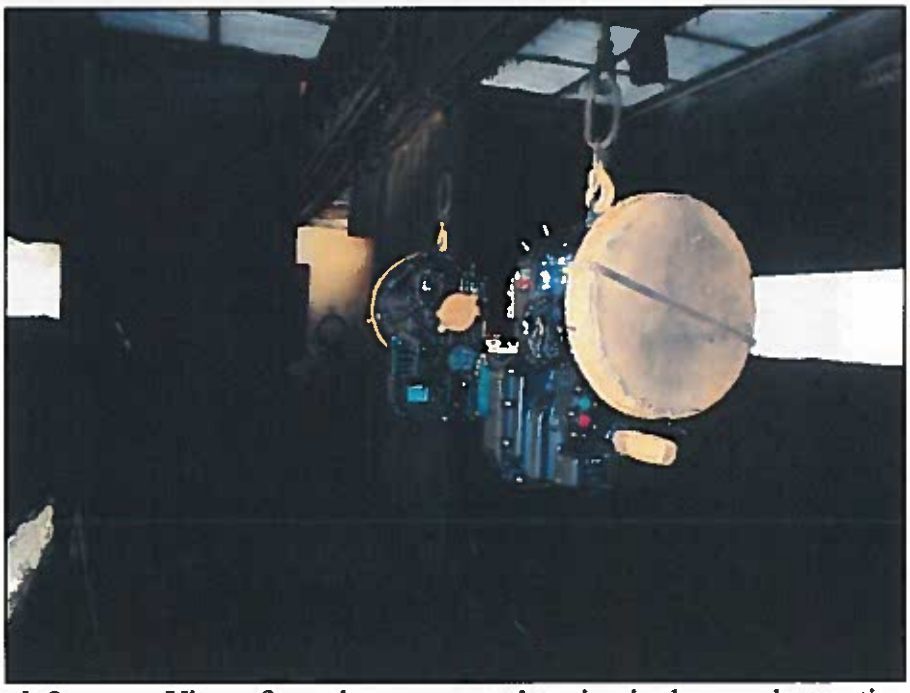
Attachment 1	Photograph Log
Attachment 2	Document Log

Attachment 1

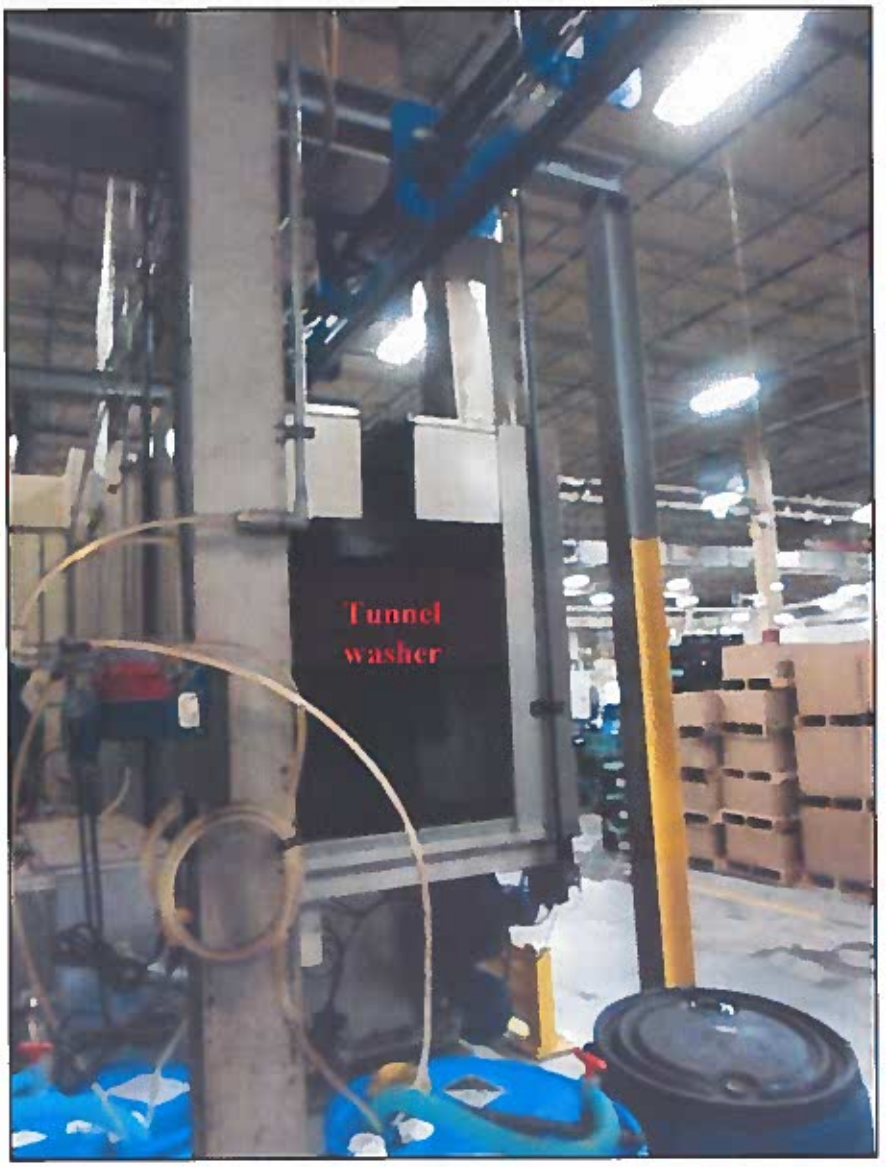
ZF Gainesville, LLC – GNS 1 Facility

Photograph Log

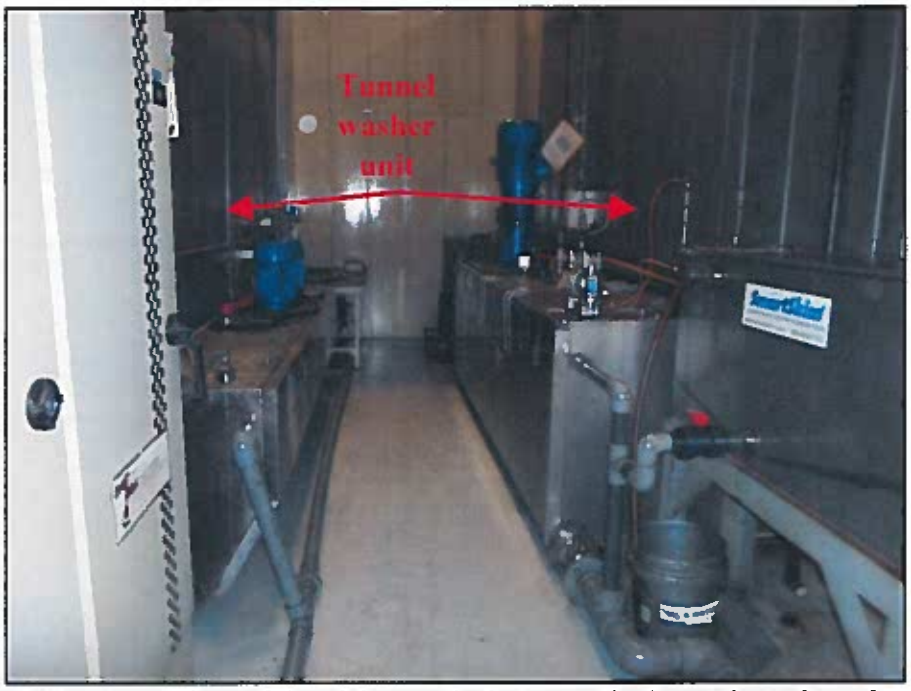
Photograph 1. View of the facility's "sump sucker" unit used to the transfer the contents of the collection sump to the outdoor holding tank.



Photograph 2. View of metal components hanging in the powder coating line process area.



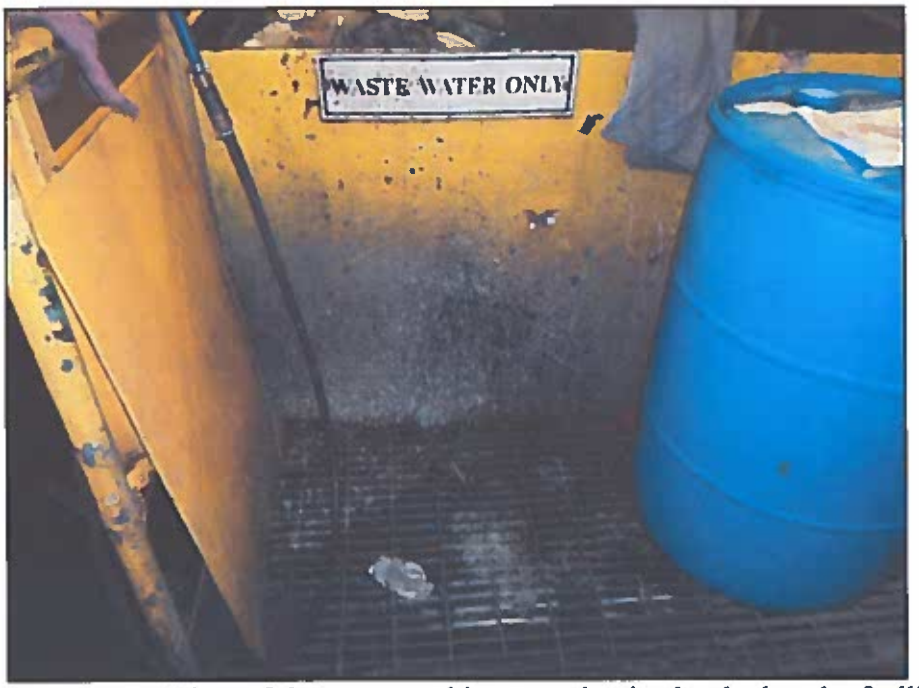
Photograph 3. View of the facility's tunnel washer unit used for the iron phosphating process.



Photograph 4. View of the aisle way in-between the horseshoe-shaped tunnel washer unit.

Photograph 5. View of the 2,000-gallon wastewater holding tank and 1,000-gallon oily waste storage tank, located in the outdoor tank storage containment area.

Photograph 6. View of the drian in the outdoor tank storage containment area. The drain was locked at the time of the inspection. The facility representative explained that the drain is opened to release storm water that accumulates in the containment structure.



Photograph 7. View of the parts washing area that is plumbed to the facility's 2,000-gallon wastewater holding tank.

Photograph 8. View of accumulated storm water in the bottom of the secondary containment structure. Note the high water mark on the tanks indicating the level of accumulation that has previously occurred. The presence of storm water effectively reduces the capacity of the secondary containment structure.

Attachment 2

ZF Gainesville, LLC – GNS 1 Facility

Document Log

Attachment 2.A

ZF Gainesville, LLC – GNS 1 Facility

December 2010 Wastewater Profile Sampling Results, City of Gainesville Public Utilities Department

DSC
9/1/11

CITY OF GAINESVILLE
•
PUBLIC UTILITIES
DEPARTMENT
•
757 Queen City Parkway, S.W.
Gainesville, Georgia 30501
Telephone: 770 . 538 . 2466
Fax: 770 . 535 . 5634
Web Site: www.gainesville.org

December 14, 2010

ZF Transmission
Denny Allen
1261 Palmour Drive S.W.
Gainesville, GA 30501

Re: Wastewater Sampling Results

Dear Denny Allen

This letter is to notify you that on December 7, 2010 a sample of wastewater was analyzed for conventional pollutants as identified below:

Parameter	Sampling Results		Surcharge Limits*	Violation Limits**	In Violation?
Phosphorus	12.3	mg/L	7 mg/l	20 mg/l	No
Oil and Grease (O/G)	45.3	mg/L	100 mg/l	125 mg/l	No
TSS	44	mg/L	250 mg/l	900 mg/l	No
BOD	244	mg/L	250 mg/l	900 mg/l	No
pH	8.9	STD UNITS	6.0 - 9.5 Units	6.0 - 9.5 Units	No
TKN	123	mg/L	40 mg/l	135 mg/l	No

Please be aware that if you have exceeded the Surcharge Limits listed above, then you may be required to pay surcharges and/or install pretreatment equipment as directed in the Gainesville Code of Ordinances.

If you have questions, please contact me at 532-7462.

Sincerely,

CITY OF GAINESVILLE
ENVIRONMENTAL SERVICES

Horace Gee
Environmental Services Administrator

* Section 10-1-17
** Section 5-1-67(b)

DJC
9/1/11

4480 Keith Bridge Rd.
Cumming, GA 30041

AMPRO LABORATORIES

Phone: 770-887-6011
Fax: 770-781-5846

Certificate of Analysis

Client Name	ZF Industries Inc	Page:	Page 1 of 2
Contact:	Mickey Maier	Lab Project #:	11092910
Address:	1261 Palmour Dr. SW	Report Date:	10/3/2011
	Gainesville, GA 30501	Client Project:	Water
		PO Number:	4500938773

Lab Sample #:	11092910-01	Sampled Date/Time:	29 Sep 11 07:30
Sample Description:	Sewer Water	Received:	29 Sep 11 08:56
Sample Number:	#1 S & R Restrooms		

Test Method	Analyte Name	Result	Units	Det. Limit	Analysis Date	Analyst
EPA351.2	Kjeldahl Nitrogen, Total	2.70	mg/L	0.4	30 Sep 11	CC

Lab Sample #:	11092910-02	Sampled Date/Time:	29 Sep 11 07:30
Sample Description:	Sewer Water	Received:	29 Sep 11 08:56
Sample Number:	#2 Rear Mezz Coke		

Test Method	Analyte Name	Result	Units	Det. Limit	Analysis Date	Analyst
EPA351.2	Kjeldahl Nitrogen, Total	37.9	mg/L	0.4	30 Sep 11	CC

Lab Sample #:	11092910-03	Sampled Date/Time:	29 Sep 11 07:30
Sample Description:	Sewer Water	Received:	29 Sep 11 08:56
Sample Number:	#3 Training Room		

Test Method	Analyte Name	Result	Units	Det. Limit	Analysis Date	Analyst
EPA351.2	Kjeldahl Nitrogen, Total	23.1	mg/L	0.4	30 Sep 11	CC

Lab Sample #:	11092910-04	Sampled Date/Time:	29 Sep 11 07:30
Sample Description:	Sewer Water	Received:	29 Sep 11 08:56
Sample Number:	#4 MB Repair Cage		

Test Method	Analyte Name	Result	Units	Det. Limit	Analysis Date	Analyst
EPA351.2	Kjeldahl Nitrogen, Total	46.2	mg/L	0.4	30 Sep 11	CC

Approved By:

Brenda Edwards

Laboratory Supervisor

AMPRO LABORATORIES
4480 KEITH BRIDGE RD.
CUMMING, GA 30041
Tel 770-887-6011 Fax 770-781-5846

Page: 1 of 1

Chain of Custody Record

Client Name: ZF Industries LLC	
Client Address Phone & Fax Number: 1261 Palmour Drive Gainesville GA 30501	
Attention: Denny Allen	E-Mail: dennyallen@zf.com
Requested Completion Date: 12-19-11	CC:
Project Name: Sewer TKN samples	PO# 4500938773
Project #: 121411-1	

Date	Time	Matrix Code*	GRAB	COMP	Sample Identification	# OF CONTAINERS	TKN								pH
12-14-11	9:00 AM	WW	X		1 main manhole street		X								
12-14-11	9:00 AM	WW	X		2 MB Repair Cage		X								

Analysis Required / Container Type

FOR LAB USE ONLY
Lab#:
Quote#:

*Matrix Codes:
DW = Drinking Water S = Soil
WW = Wastewater SL = Sludge
GW = Groundwater SD = Solid
SW = Surface water A = Air
ST = Storm water O = Oil
L = Liquid P = Product

Comments:

Sampled By: Harvey Rainer	Date/Time: 12/14/11 9:00 AM	Relinquished By: [signature]	Date/Time: 12-14-11 11:00
Received By:	Date/Time:	Relinquished By:	Date/Time:
Received By:	Date/Time:	Relinquished By:	Date/Time:
Received By Lab: Courtney Taylor	Date/Time: 12/14/11 11:20 AM	Sample Shipped Via: UPS Fed EX Courier (Client) DHL Other	
Entered Into Lims:	COC Reviewed:	Air Bill #:	

COC/Custody Seal:
ICE:
Temperature:
Sample Condition:

DJE 12/21/11

Attachment 2.B

ZF Gainesville, LLC – GNS 1 Facility

Environmental Remedies, LLC wastewater hauling manifest, dated October 9, 2014

Environmental Remedies
All solutions lead to clean.
www.envremedies.com

Environmental Remedies, LLC
460 Sawtell Avenue, Atlanta, GA 30315
404-627-5931 • 800-399-2783 • Fax: 404-627-6071

Sample # _____ Profile # 65001 SO# 5366

A. Billing Information (Written price quotes and inquires will be sent to this address.)

Company ZF Gainesville, LLC Account# _____
Address 1261 Palmour Drive
City/State Gainesville, GA Zip 30507 Contact Paul Cowart
Phone 770-297-4050 Fax 770-297-4023 Cell Phone 678-283-0638
Email paul.cowart@zf.com

B. Generator Information / Location of Waste

Generator Name ZF Gainesville, LLC Technical Contact Paul Cowart
Premise Address 1261 Palmour Drive
City/State Gainesville, GA Zip 305007 Contact Email paul.cowart@zf.com
Contact Phone 770-297-4050 Contact Fax 770-297-4023 Contact Cell Phone 678-283-0638
Type of Business Activity Manufacturing of transmissions and steering components SIC / NAICS Code(s) 3400

C. Waste Description [Fill in the following blanks that apply and check any applicable box(es)]

Common Name of Waste Process Wastewater
Process Generating Waste (Refer to applicable processes from attached Table A, mark any that apply and list any additional processes in the following space)
co-mingled waste water from coolants, washers, mop water, etc.

☑ Waste by-product from process
☐ Spill clean up
☐ Planned Site Remediation
☐ From a UST Corrective Action
☐ Other _____

☐ Unused Product or Chemical: Are chemicals present which are listed in 40 CFR 261.33 (e) or (f) "U or P listed waste". If so, which chemicals? List below:

☐ Water that contains spill cleanup residue from unused product or chemicals which are listed in 40 CFR 261.33 (e) or (f) "U or P listed waste", if so, which chemicals. List below:

D. Physical Properties (at 25° C or 77° F)

Physical State
☐ 100% Solid Without Free Liquid
☐ 100% Liquid with No Solids
☑ Liquid/solid mixture
99 % Free Liquid
1 % Settled Solids
_____ % Total Suspended Solids

Number of Phases/Layers
☐ 1 ☑ 2 ☐ 3

% By Volume (Approx.)
Top 98-99 Middle _____ Bottom 1-2

Odor
☐ None
☑ Mild
☐ Strong
Describe: detergeant

Color
☐ Transparent
☐ Translucent
☑ Opaque
Describe: brown

Flash Point
☐ < 73° F
☐ 73° - 100° F
☐ 101° - 140° F
☐ 141° - 200° F
☑ > 200° F

pH
☐ <2
☐ 2.1 - 4.9
☑ 5.1 - 9
☐ 9.1 - 12.5
☐ > 12.5

Specific Gravity
☐ < 0.8 (e.g. Petroleum)
☐ 0.8 - 1.0 (e.g. Water/Petroleum)
☐ 1.0 (e.g. Water)
☑ 1.0 - 1.2 (e.g. Antifreeze)
☐ >1.2 (e.g. Methylene Chloride)

Viscosity
☑ Low (e.g. Water)
☐ Medium (e.g. Motor Oil)
☐ High (e.g. Molasses)

Reactivity
Does the waste have the potential for release of gas, e.g., hydrogen sulfide or cyanide, with change of pH or risk of fire or explosion from sparks, being shaken or otherwise subjected to "initiating force"? ☐ Yes ☑ No
Describe the potential if any: _____

E. Volume

Anticipated Volume: 5000 gallons ☐ Drums ☐ Bulk ☑ Other as needed

Generation Frequency ☐ One Time ☐ Batch ☑ Continuous

Estimated Shipment Frequency: ☐ Weekly ☐ Semimonthly ☐ Monthly ☑ Quarterly

☐ Other _____

F. Composition (Must add up to 100%. Include inert materials and/or debris if applicable.)

water	90 %	cutting oils	1-2 %
coolants	< 1 %	debris	6 %
phosphate/alkali washer water	< 1 %		%
		Total	100 %

G. Constituents (Provide chemical concentrations below and attach all available data including Lab Analysis and MSDS's)

These values are based on ☑ knowledge ☐ testing

INORGANIC

RCRA Regulated Metals	Regulatory Level (m/gl)	Conc. (mg/l)
D004 Arsenic	5.0	0
D005 Barium	100.0	0
D006 Cadmium	1.0	0
D007 Chromium	5.0	0
D008 Lead	5.0	0
D009 Mercury	0.2	0
D010 Selenium	1.0	0
D011 Silver	5.0	0

Other	Conc. (mg/l)
Ammonia	< 500 mg/l
Phosphorus	< 500 mg/l
Formaldehyde	< 20 mg/l
COD	< 100,000
Total Solids	7.5%
PCBs	0
Dioxins	0

Pesticides/Herbicides		Regulatory Level (mg/l)	Conc. (mg/l)
D012	Endrin	0.02	0
D013	Lindane	0.4	0
D014	Methoxychlor	10.0	0
D015	Toxaphene	0.5	0
D016	2,4-D	10.0	0
D017	2,4,5 - TP (Silvex)	1.0	0
D020	Chlordane	0.03	0
D031	Heptachlor (and its exposide)	0.008	0

OTHER METALS: Conc. (mg/l)

Antimony	0	Copper	0	Titanium	0
Beryllium	0	Nickel	0	Vanadium	0
Cobalt	0	Tin	< 50 mg/l	Zinc	0

ORGANIC

Volatile Compounds	Regulatory Level (mg/l)	Conc. (mg/l)
D018 Benzene	0.5	0
D019 Carbon Tetrachloride	0.5	0
D021 Chlorobenzene	100.0	0
D022 Chloroform	6.0	0
D028 1,2 – Dichloroethene	0.5	0
D029 1,1 – Dichloroethylene	0.7	0
D035 Methyl Ethyl Ketone	200.0	0
D039 Tetrachloroethylene	0.7	0
D040 Trichloroethylene	0.5	0
D043 Vinyl Chloride	0.2	0

Semi-Volatile Compounds		Regulatory Level (mg/l)	Conc (mg/l)
D023	o-Cresol	200.0	0
D024	m-Cresol	200.0	0
D025	p-Cresol	200.0	0
D026	Cresol (Total)	200.0	0
D027	1,4-Dichlorobenzene	7.5	0
D030	2,4-Dinitrotoluene	0.13	0
D032	Hexchlorobenzene	0.13	0
D033	Hexachlorobutadiene	0.5	0
D034	Hexachloroethane	3.0	0
D036	Nitrobenzene	2.0	0
D037	Pentachlorophenol	100.0	0
D038	Pyridine	5.0	0
D041	2,4,5-Trichlorophenol	400.0	0
D042	2,4,6-Trichlorophenol	2.0	0

Other Hazards

- ☐ Water Reactive
- ☐ OSHA Regulated Carcinogens
- ☐ Oxidizer
- ☐ Reducer
- ☐ Infectious
- ☐ Thermally Sensitive
- ☐ Corrosive
- ☐ Other _____

H. Regulatory Status

Is the waste a RCRA Characteristic or Listed Hazardous Waste (per 40 CFR § 261)?	☐ Yes	☑ No
Will treatment of waste generate a listed hazardous waste?	☐ Yes	☑ No
Is the waste a State Hazardous Waste?	☐ Yes	☑ No
Is the waste a Used Oil (per 40 CFR § 279)?	☐ Yes	☑ No
Is this waste regulated under the Benzene NESHAP rules (per 40 CFR § 61)?	☐ Yes	☑ No
Is this waste from a UST Corrective Action and not subject to waste codes D018 through D043 [per 40 CFR § 261.4(b)(10)]?	☐ Yes	☑ No
Is the waste a USDOT Hazardous Material?	☐ Yes	☑ No

If yes to any, describe: _____

I. Sample Status

Representative sample has been supplied? ☑ Yes ☐ No

Sampled by: Del Evans

Date Sampled: _____

J. Generator's Certification

I hereby certify and acknowledge as follows: 1) all representations made by or on behalf of the undersigned in this form and all documents submitted with this form are true and correct; 2) any samples submitted are representative of the waste actually sent for treatment; and 3) as generator of the waste, I am legally responsible for making a determination as to whether the waste I am submitting is a hazardous waste under the Resource Conservation and Recovery Act, 42 U.S.C. § 6907, *et seq.*, as provided in 40 Code of Federal Regulations Section 262.11.[1]

If Environmental Remedies discovers a discrepancy during the approval process, generator grants Environmental Remedies the authority to amend the profile as Environmental Remedies deems necessary to reflect the discrepancy.

Signature of Generator Representative	Generator Representative Name (print)	Date
Paul	Paul Cowart	10/9/14
Environmental Remedies Representative	Orit Evans	

Table A - Industrial Processes

Mark yes or no for any and all industrial processes that apply to your operation(s)

Yes	No	
☐	☑	electroplating or anodizing[2]
☐	☑	metal heat treating operations where cyanides are used in the process
☐	☑	chemical conversion coating of aluminum
☐	☑	wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations
☐	☑	wood preserving processes generated at plants that use creosote
☐	☑	wood preserving processes generated at plants that use inorganic preservatives containing arsenic or chromium
☐	☑	petroleum refining
☐	☑	leachate (liquids that have percolated through land disposed wastes) resulting from the disposal of more than one restricted waste classified as hazardous
☐	☑	the production of chrome yellow and orange pigments
☐	☑	the production of molybdate orange pigments
☐	☑	the production of zinc yellow pigments
☐	☑	the production of chrome green pigments
☐	☑	the production of chrome oxide green pigments (anhydrous and hydrated)
☐	☑	the production of iron blue pigments
☐	☑	the production of acrylonitrile
☐	☑	the production of chlordane
☐	☑	the chlorination of cyclopentadiene in the production of chlordane
☐	☑	the production of creosote
☐	☑	the production of disulfoton
☐	☑	the washing and stripping of phorate production
☐	☑	the production of phorate
☐	☑	the production of toxaphene
☐	☑	the manufacturing and processing of explosives
☐	☑	carbon from the treatment of wastewater containing explosives
☐	☑	the manufacturing, formulation and loading of lead-based initiating compounds
☐	☑	Pink/red water from TNT operations
☐	☑	the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds
☐	☑	the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead
☐	☑	the production of 2,4-D
☐	☑	nitrobenzene/aniline production
☐	☑	the mercury cell process in chlorine production
☐	☑	dinitrotoluene via nitration of toluene
☐	☑	the production of toluenediamine via hydrogenation of dinitrotoluene
☐	☑	the production of ethylene dibromide via bromination of ethene
☐	☑	the production of ethylenebisdithiocarbamic acid and its salts
☐	☑	the production of methyl bromide
☐	☑	the recovery of coke by-products produced from coal
☐	☑	the production of alpha- (or methyl-) chlorinated toluenes, ring-chlorinated toluenes, benzoyl chlorides, and compounds with mixtures of these functional groups
☐	☑	the production of carbamates and carbamoyl oximes
☐	☑	the production of ethylene dichloride or vinyl chloride monomer
☐	☑	the production of vinyl chloride monomer using mercuric chloride catalyst in an acetylene-based process

[1] 40 C.F.R.§262.11 states as follows:
A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method
(a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.
(b) He must then determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261.
(c) For purposes of compliance with 40 CFR part 268, or if the waste is not listed in subpart D of 40 CFR part 261, the generator must then determine whether the waste is identified in subpart C of 40 CFR part 261 by either
(1) Testing the waste according to the methods set forth in subpart C of 40 CFR part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used
(d) If the waste is determined to be hazardous, the generator must refer to parts 261, 264, 265, 266, 267, 268, and 273 of this chapter for possible exclusions or restrictions pertaining to management of the specific waste.

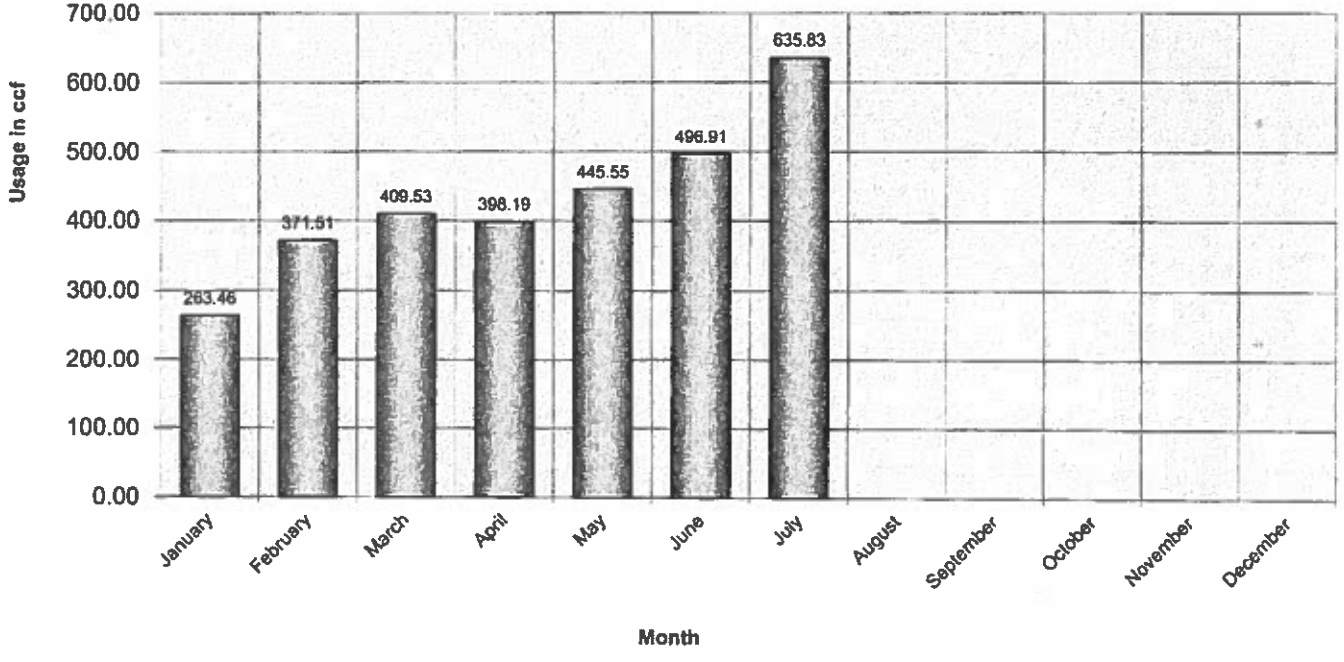
[2] Electroplating includes plating production processes that include common and precious metals electroplating, anodizing, chemical conversion coating (i.e., coloring, chromating, phosphating and immersion plating), electroless plating, chemical etching and milling and printed circuit board manufacturing. The primary purpose of electroplating operations is to apply a surface coating, typically by electrode decomposition, to provide protection against corrosion to increase wear or corrosion resistance, or for decorative purposes. Anodizing is usually performed on aluminum parts using solutions of sulfuric or chromic acid often followed by a hot water bath; however, nickel acetate or sodium or potassium dichromate seal may also be used in the process

Attachment 2.C

ZF Gainesville, LLC – GNS 1 Facility

2015 Sanitary Sewer Graph and Waste Graph

2015 - Plant sanitary sewage

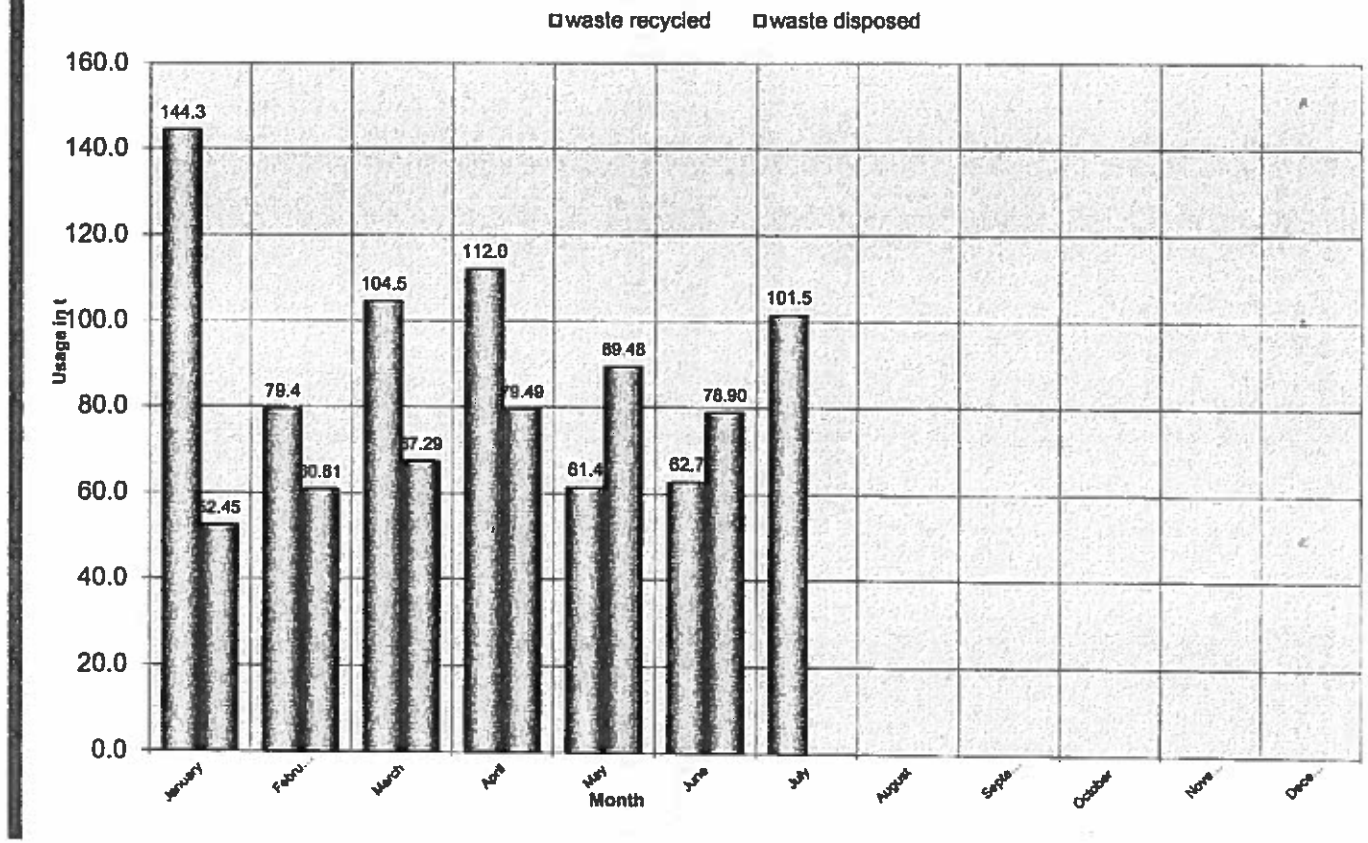


Monitoring and Measuring

Environmental Data Spreadsheet 1 2015

ISO-160-006-4

2015 - Waste



Monitoring and Measuring

Environmental Data Spreadsheet 1 2015

ISO-160-006-4

Attachment 2.D

ZF Gainesville, LLC – GNS 1 Facility

Environmental Remedies, LLC and ZF Industries Sales History Documents, January 1, 2015 through July 31, 2015

Environmental Remedies, LLC

ZF Industries Sales History 01/01/15 to 07/31/15

Generator (All)

$ Total	Column Labels 2015							
Row Labels	Jan	Feb	Mar	Apr	May	Jun	Jul	Grand Total
IC				950.00				950.00
LABOR - TECHNICIAN				280.00				280.00
SAFETY EQUIPMENT LEVEL A				150.00				150.00
VACUUM TRUCK/ HR				520.00				520.00
TRANS	501.50	1,504.50	1,003.00	477.10	522.75	501.50	501.50	5,011.85
FUEL SURCHARGES	76.50	229.50	153.00	152.10	76.50	76.50	76.50	840.60
LOADING TIME (1 hr free)					21.25			21.25
TRANSPORTATION VAC TRUCK				325.00				325.00
TRANSPORTATION/FREIGHT	425.00	1,275.00	850.00		425.00	425.00	425.00	3,825.00
WW	476.65	2,010.03	1,336.33	663.95	1,339.72	709.88	715.83	7,252.39
65001 INDUSTRIAL PROCESS WASTE	476.65	2,010.03	1,336.33	663.95	1,339.72	709.88	715.83	7,252.39
Grand Total	978.15	3,514.53	2,339.33	2,091.05	1,862.47	1,211.38	1,217.33	13,214.24

Environmental Remedies, LLC

ZF Industries Sales History 01/01/15 to 07/31/15

Generator	(All)

Quantity	Column Labels							
Row Labels	Jan	Feb	Mar	Apr	May	Jun	Jul	Grand Total
IC				13.00				13.00
LABOR - TECHNICIAN				8.00				8.00
SAFETY EQUIPMENT LEVEL A				1.00				1.00
VACUUM TRUCK/ HR				4.00				4.00
TRANS	2.00	6.00	4.00	3.00	3.25	2.00	2.00	22.25
FUEL SURCHARGES	1.00	3.00	2.00	2.00	1.00	1.00	1.00	11.00
LOADING TIME (1 hr free)					1.25			1.25
TRANSPORTATION VAC TRUCK				1.00				1.00
TRANSPORTATION/FREIGHT	1.00	3.00	2.00		1.00	1.00	1.00	9.00
WW	1,906.59	8,040.10	5,345.33	1,896.99	5,358.88	2,839.52	2,863.31	28,250.72
65001 INDUSTRIAL PROCESS WASTE	1,906.59	8,040.10	5,345.33	1,896.99	5,358.88	2,839.52	2,863.31	28,250.72
Grand Total	1,908.59	8,046.10	5,349.33	1,912.99	5,362.13	2,841.52	2,865.31	28,285.97

Environmental Remedies, LLC

ZF Industries Sales History 01/01/15 to 07/31/15

Sales Rep	Customer Billed	Generator	Date	Invoice Number	Sales Order	PO	Manifest	Item #	Description	Quantity	UOM	Price/ UOM	Total Sales	Type
EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				65001	65001 INDUSTRIAL PROCESS WASTE	1,907	GALLON	0	476.65	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				65001	65001 INDUSTRIAL PROCESS WASTE	2,417	GALLON	0	604.27	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				65001	65001 INDUSTRIAL PROCESS WASTE	2,925	GALLON	0	731.30	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				65001	65001 INDUSTRIAL PROCESS WASTE	2,698	GALLON	0	674.46	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				65001	65001 INDUSTRIAL PROCESS WASTE	2,703	GALLON	0	675.66	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				65001	65001 INDUSTRIAL PROCESS WASTE	2,643	GALLON	0	660.67	WW
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		65001	65001 INDUSTRIAL PROCESS WASTE	1,897	GALLON	0	663.95	WW
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		65001	65001 INDUSTRIAL PROCESS WASTE	5,359	GALLON	0	1,339.72	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				65001	65001 INDUSTRIAL PROCESS WASTE	2,840	GALLON	0	709.88	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				65001	65001 INDUSTRIAL PROCESS WASTE	2,863	GALLON	0	715.83	WW
										28,251			7,252.39	WW Total
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		FUEL	FUEL SURCHARGES	1		0	58.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		FUEL	FUEL SURCHARGES	1		0	93.60	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		LOADTIME	LOADING TIME (1 hr free)	1	HOUR	85	21.25	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		TRANSVACTK	TRANSPORTATION VAC TRUCK	1	EACH	325	325.00	TRANS
										22			5,011.85	TRANS Total
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		LABORTECH	LABOR - TECHNICIAN	8	HOUR	35	280.00	IC
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		SAFETYLEVA	SAFETY EQUIPMENT LEVEL A	1	DAY	150	150.00	IC
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		VACTRUCKH	VACUUM TRUCK/ HR	4	HOUR	130	520.00	IC
										13			950.00	IC Total
										28,286			13,214.24	Grand Total

Environmental Remedies, LLC

ZF Industries Sales History 01/01/15 to 07/31/15

Sales Rep	Customer Billed	Generator	Date	Invoice Number	Sales Order	PO	Manifest	Item #	Description	Quantity	UOM	Price/ UOM	Total Sales	Type
EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				65001	65001 INDUSTRIAL PROCESS WASTE	1,907	GALLON	0	476.65	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				65001	65001 INDUSTRIAL PROCESS WASTE	2,417	GALLON	0	604.27	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				65001	65001 INDUSTRIAL PROCESS WASTE	2,925	GALLON	0	731.30	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				65001	65001 INDUSTRIAL PROCESS WASTE	2,698	GALLON	0	674.46	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				65001	65001 INDUSTRIAL PROCESS WASTE	2,703	GALLON	0	675.66	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				65001	65001 INDUSTRIAL PROCESS WASTE	2,643	GALLON	0	660.67	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		65001	65001 INDUSTRIAL PROCESS WASTE	1,897	GALLON	0	663.95	WW
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		FUEL	FUEL SURCHARGES	1		0	58.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		FUEL	FUEL SURCHARGES	1		0	93.60	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		TRANSVACTR	TRANSPORTATION VAC TRUCK	1	EACH	325	325.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		LABORTECH	LABOR - TECHNICIAN	8	HOUR	35	280.00	IC
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EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		VACTRUCKH	VACUUM TRUCK/ HR	4	HOUR	130	520.00	IC
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		65001	65001 INDUSTRIAL PROCESS WASTE	5,359	GALLON	0	1,339.72	WW
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		LOADTIME	LOADING TIME (1 hr free)	1	HOUR	85	21.25	TRANS
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				65001	65001 INDUSTRIAL PROCESS WASTE	2,840	GALLON	0	709.88	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				65001	65001 INDUSTRIAL PROCESS WASTE	2,663	GALLON	0	715.83	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS

Environmental Remedies, LLC

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EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	01/22/15	25037				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				25037 Total									978.15	
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				65001	65001 INDUSTRIAL PROCESS WASTE	2,417	GALLON	0	604.27	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/02/15	26731				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				26731 Total									1,105.77	
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				65001	65001 INDUSTRIAL PROCESS WASTE	2,925	GALLON	0	731.30	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/10/15	28403				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				28403 Total									1,232.80	
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				65001	65001 INDUSTRIAL PROCESS WASTE	2,698	GALLON	0	674.46	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	02/23/15	30780				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				30780 Total									1,175.96	
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				65001	65001 INDUSTRIAL PROCESS WASTE	2,703	GALLON	0	675.66	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/10/15	32787				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				32787 Total									1,177.16	
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				65001	65001 INDUSTRIAL PROCESS WASTE	2,643	GALLON	0	660.67	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	03/25/15	35641				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				35641 Total									1,162.17	
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		65001	65001 INDUSTRIAL PROCESS WASTE	1,897	GALLON	0	663.95	WW
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		FUEL	FUEL SURCHARGES	1		0	58.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		FUEL	FUEL SURCHARGES	1		0	93.60	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		TRANSVACTR	TRANSPORTATION VAC TRUCK	1	EACH	325	325.00	TRANS
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		LABORTECH	LABOR - TECHNICIAN	8	HOUR	35	280.00	IC
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		SAFETYLEVA	SAFETY EQUIPMENT LEVEL A	1	DAY	150	150.00	IC
EAST	ZF Industries	ZF INDUSTRIES, INC.	04/18/15	41141		4500958386		VACTRUCKH	VACUUM TRUCK/ HR	4	HOUR	130	520.00	IC
				41141 Total									2,091.05	
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		65001	65001 INDUSTRIAL PROCESS WASTE	5,359	GALLON	0	1,339.72	WW
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		LOADTIME	LOADING TIME (1 hr free)	1	HOUR	85	21.25	TRANS
EAST	ZF Industries	ZF WINDPOWER	05/08/15	43226		4501480629		TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				43226 Total									1,862.47	
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				65001	65001 INDUSTRIAL PROCESS WASTE	2,840	GALLON	0	709.88	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	06/24/15	52573				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				52573 Total									1,211.38	
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				65001	65001 INDUSTRIAL PROCESS WASTE	2,863	GALLON	0	715.83	WW
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				FUEL	FUEL SURCHARGES	1		0	76.50	TRANS
EAST	ZF Industries	ZF INDUSTRIES, LLC	07/08/15	55261				TRANS	TRANSPORTATION/FREIGHT	1	EACH	425	425.00	TRANS
				55261 Total									1,217.33	
				Grand Total									13,214.24	

END OF REPORT

ENCLOSURE B

INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT

Instructions

1. Identify the person(s) responding to this Information Request.

2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.

3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.

4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.

5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.

6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA as soon as possible.

7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.

8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.

10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

11. The EPA requests that all documents provided in an electronic format be compatible with pdf.

12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.

13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.

2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.

3. The terms "And" and "Or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside it scope.

4. The term "Identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

5. The term "Identify" means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.

6. The term "Identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.

7. The term "Facility" means ZF Gainesville, LLC's facility located at 1261 Palmour Drive SW in Gainesville, Hall County, Georgia.

8. The term "You" and "Your" shall mean ZF Gainesville, LLC.

9. The term "Permit" shall mean an industrial user permit issued to the Facility by the Control Authority.

10. "Control Authority" shall have the meaning set forth in 40 C.F.R. § 403.3(f).

Questions

1. Identify the names and addresses of the current owner(s) of the Facility properties. Specify the legal name with the exact spelling of each owner. Specify the state of incorporation and principal place of business for each corporate owner. If incorporated, provide the name and mailing address of the registered agent. Additionally, provide a copy of the deed(s) of ownership of the Facility.

2. Identify the parent corporation and all subsidiaries of ZF Gainesville, LLC.

3. If the Facility has applied for and/or received a Permit for such discharges, then provide a timeline of the wastewater permitting history for the Facility, e.g., from 1987 to the present, including:

   a. the date(s) that Permit applications were either requested by the Control Authority or submitted by the Facility;

   b. the date(s) that draft or final Permit(s) were received by the Facility; and

   c. the date(s) that comments on such draft(s) were submitted to the Control Authority.

   If the Facility has never received a Permit for the discharge of process wastewaters to a publicly owned treatment works, then please explain this in the response.

4. Provide the date that the evaporator system was installed, the date that it first began operation, and the date that discharges of phosphate washwaters ceased being discharged to a public sewer, if they were discharged there previously.

5. Provide a legible engineering schematic of all conveyances leading to and from the evaporator unit(s), indicating any valves and other appurtenances, any bypass lines and their operating controls, the direction of flow, a description of the flow sources and endpoints, and a description of the flow contents.

6. Identify what procedures the Facility has in place, if any, to address a circumstance where the evaporator system suddenly becomes temporarily or permanently inoperable.

7. If the Facility evaporator first began operation on or after November 1, 2011, then also provide the following:

   a. Provide complete copies of all communication to or from the Control Authority from the date the phosphate wash assets were purchased to the date the evaporator first began operation which concern the Facility's process wastewater discharge(s). This information should be organized in chronological order with a table of contents. Communication that only regards water/sewer service billing or payment can be excluded;

   b. Provide a timeline identifying the Facility's construction and narrative describing its iron phosphate wash assets and their acquisition dates. Include the dates when the initial

construction of those assets began and when the initial discharge of process wastewater to the public sewer began and ceased;

c. If the Facility was purchased in whole or part, then also provide the final contract date(s) for the purchase(s) of the phosphate wash assets. Provide the final purchase contract dates and detailed descriptions of any substantive modifications, additions, or replacements made to any iron phosphate wash assets;

d. Provide all wastewater monitoring data collected by, or under contract to, the Facility since the discharge of process wastewater from the Facility to a public sewer began until it ended. The EPA prefers that such data be provided as a summary in an electronic spreadsheet format compatible with MS Excel. Present the data for laboratory-tested samples separately from data for flow, pH, temperature and other field- or continuously-monitored parameters. Include the following for each data point:

    i. Parameter monitored;

    ii. Date monitored (month/day/year);

    iii. Analytical result;

    iv. Units;

    v. Analytical method;

    vi. Sample type (grab, time-proportional composite, or flow-proportional composite)

    vii. Flow recorded at the time of monitoring;

    viii. Sampling location; and

    ix. Flow monitoring location.

    Analytical methods need only be provided for laboratory analyses; for flow, pH, temperature and other field- or continuously-monitored parameters, identify the testing equipment used and their calibration frequencies. For flow monitoring data, only (i), (ii), (iii), (iv), and (ix) need to be provided;

e. Provide a copy of any inspection reports, notices of violations, administrative orders, cease and desist orders, and any related correspondence from local, State or federal agencies related to the Facility since any discharge of process wastewater began from the Facility to a public sewer; and,

f. Provide copies of all reporting sent in accordance with the regulations at 40 C.F.R. § 403.12 and/or under the Permit beginning at least 90 days before discharge to a public sewer until the date of this Information Request, including, but not limited to:

    i. Baseline report, as required by 40 C.F.R. § 403.12(b)

ii. Report on initial compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(d); and

iii. Periodic report(s) on continuing compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(e).

ENCLOSURE C

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS
(40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that the EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, the EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, the EPA may make the information available to the public without any further notice to you.

40 C.F.R. § 2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to the EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by the EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.